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CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

21cr180 JRT
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No.

UNITED STATES OF AMERICA,

Plaintiff,

INFORMATION

v.

ARKADY PAVLOVICH PICHURIN,

Defendant.

THE ACTING UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

From on or about November 8, 2020 to on or about January 8, 2021, in the State and District of Minnesota, the defendant,

Arkady Pavlovich Pichurin,

did employ, use, persuade, induce, entice, and coerce a minor female, MINOR A, who was between the ages of 9 and 10-years-old at the time, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, including but not limited to, electronic files with the following MD5 values and images:

| MD5 Value | Description |
|----------------------------------|---|
| eedbcfdf577e8e9012e2e8cee3c2cb84 | A video wherein Minor A is seen completely naked with her vagina exposed |
| 4777dc10191abf21b05985cf69df1f49 | A video wherein Minor A is exposing her vagina and anus to the camera |
| 0b944f2b582a105c399156197b8f50b | A video wherein Minor A exposes her bare buttocks, pulling the cheeks apart to expose her anus and vaginal lips |

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where such depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by an Asus Vivobook laptop computer, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATIONS

Upon conviction on Count 1 in this Information, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

1. any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18, United States Code;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The property subject to forfeiture upon conviction on Count 1 in this Information includes, but is not limited to:

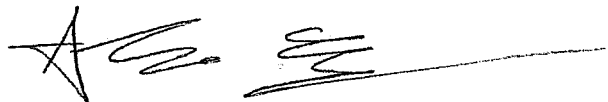
- a. Asus Vivobook M4130 laptop computer with serial number L7N0CX02898127G;

- b. Motorola Moto G-6 cellular telephone with MEID 256691840601451893;
- c. Samsung Note 8 SM-N950U cellular telephone with IMEI 358505084854658;
- d. Samsung Behold SCH-T919 cellular telephone with serial number R7WS627304V;
- e. Samsung Slash SPH-M310 cellular telephone with HEX A1000001023448;
- f. HTC Windows cellular telephone with serial number HT23TVR01061;
- g. Apple iPhone X A1901 cellular telephone with serial number FK1VQ4WNJCLH;
- h. 16GB Lexar flash drive; and
- i. 8GB Apple iPod Touch 2G A1288 with serial number 1B922A8B201.

If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)(c).

Dated: *August 20, 2021*

W. ANDERS FOLK
Acting United States Attorney



BY: ALEXANDER D. CHIQUOINE
Assistant U.S. Attorney
Attorney ID No. 0396420